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Department of Agriculture

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November 28, 2014

Howard County Council
ATTN: Co-chairs, Zack Brendel and Richard Goldman
Task Force to Study Mulching, Composting, and Wood Processing
3430 Court House Drive
Ellicott City, MD 21043

Dear Messrs. Brendel and Goldman:

As the Council considers zoning changes that impact composting, I would like to share some thoughts with you regarding the value of composting as a viable agriculture practice. Composting to manage agricultural by-products such as manure, animal mortalities, and plant residues has been an important part of agricultural production for many years. In some circumstances, such as nursery stock production, soil that is removed in the harvest process can be replaced with compost rather than more expensive commercial topsoil. Because composting requires a variety of feedstocks to achieve a balanced product, it can effectively address both agricultural and community waste management needs. Composting, when integrated into a farming operation, not only can yield a quality product that benefits the farm itself, but can also provide potential benefits to the community by utilizing feedstocks from other farmers, local businesses, homeowners, and municipalities to build a "recipe" that ensures a proper carbon to nitrogen ratio.

Composting is enjoying a resurgence as farmers and communities share an interest in addressing constraints on traditional manure management options; general understanding of the benefits of compost utilization; and rising disposal costs and mandated recycling for materials such as municipal yard waste and food processing wastes which might be managed for a profit in an agricultural setting. In fact, these factors are encouraging many farmers to re-evaluate composting as a desirable practice for their operations.

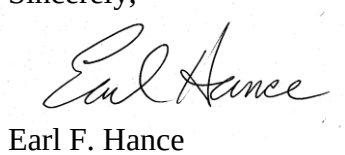
Proper composting of products that would otherwise need to be disposed of or stored reduces their volume, minimizes odors, improves ease of storage and transportation, and results in a stable end product that can be used to replenish soils that are depleted in the agricultural process. In general, finished compost is highly regarded for its ability to improve soils and enhance plant growth. It can reduce erosion and disease and weed germination while enhancing nutrient and water retention capacity, tilth, and overall productivity of the soil. Although compost is not generally considered to be a good fertilizer, it does add low concentrations of valuable nutrients to the soil in a slow release form. Satisfied compost users range from home gardeners and landscapers to farmers and local government public works departments.

Composting is increasingly being recognized across the country as beneficial, most recently as an environmentally benign way to divert a significant portion of the municipal solid waste stream out of costly landfills or incinerators. However, factors such as equipment and labor costs, land, and management requirements present logistical and financial barriers to on-farm composting. The Maryland Department of Agriculture (MDA) recognizes responsible composting as a sound, basic agricultural practice and encourages policies at all levels of government that support, promote, and minimize barriers to on-farm composting.

Existing state restrictions and requirements provide strong safeguards for agricultural composting in Maryland. MDA nutrient management regulations require farmers to manage and report compost land applications along with other nutrient sources as part of their Nutrient Management Plan to help protect the Chesapeake Bay from nutrient loading. Pending Maryland Department of the Environment (MDE) regulations that address the design and operation of composting facilities were developed with broad scientific and stakeholder input, and include restrictions to ensure that composting does not threaten the environment in Maryland. MDE's proposed regulations include stipulations specific to on-farm composting that incorporate soil conservation and water quality plans approved by local Soil Conservation Districts for certain types of operations. The MDA State Chemist regulates the sale and distribution of the final product of composting to protect consumers from contaminated or adulterated products. With these protections in place, Maryland citizens can be confident that composting in general and on farms is sustainable and safe.

In conclusion, composting is an important, mainstream, growing agricultural practice that can provide economic and environmental benefits to an agricultural operation as well as the surrounding community. Thank you for your consideration and support of on-farm composting.

Sincerely,



Earl F. Hance
Secretary